

EXHIBIT 98

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Hina Naveed, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.
2. I am a twenty-seven year old nurse and New York City resident. I currently work to help foster children in Brooklyn and Staten Island obtain access to health care services.
3. In 2001, at the age of ten, I came to New York from Dubai to seek medical care for my younger sister's life-threatening brain condition. We came to the United States after we had exhausted treatment options in both Dubai and India.
4. I worked very hard throughout school. In high school, I was salutatorian of my class and President of the National Honor Society.
5. DACA did not exist at the time I graduated from high school. Due to my undocumented status, I was ineligible for college scholarships and financial aid. As a result, I could only afford to attend college part-time.
6. In 2008, I enrolled in the College of Staten Island with the goal of pursuing a degree in nursing. My interest in health care was sparked by the compassion and empathy that I saw doctors and nurses give to my sister. I wanted the opportunity to provide similar care to other children.
7. Before DACA, I took the entrance exam to enroll in the nursing program. Students in this program immediately begin clinical rotations at hospitals as part of their studies. Although I scored very highly on the entrance exam, I was unable to enroll in the program because undocumented students are prohibited from working in hospitals.
8. In 2012, DACA was enacted. I applied and received DACA status in February 2013. When I attained DACA status, I received a social security number and work authorization. This

allowed me to enroll in the nursing program and move closer towards fulfilling my dreams of working in healthcare.

9. My DACA status also allowed me to obtain a drivers license for the first time. With this license, I was able to provide much needed assistance to my parents and help transport my sister with special needs to numerous medical appointments.
10. Although I had DACA status, I remained frightened that I would not have the opportunity to put my nursing education into practice. At the time, New York did not allow undocumented individuals like myself to obtain nursing licenses. Fortunately, the Board of Regents of New York passed a rule last year that allows undocumented individuals to apply for nursing licenses if they have DACA status. After I obtained my associates degree in nursing in 2016, I applied for and received my nursing license. I immediately put my nursing education into practice by working part-time as a home healthcare worker while finishing my college studies.
11. I received my bachelors of science degree in nursing in January 2017. As a result, I was able to obtain a position supervising the health department at a foster care agency in New York City. In this role, I am able to carry out my goal of caring for children by connecting children in foster care with the health services they need.
12. Beyond my education, I also became an immigrant's rights advocate and worked at the DREAM Action Coalition to engage youth in voter and civic engagement. I also held DACA clinics that assisted several hundred youth with DACA's application process. In addition, I worked in the Mayor's Office of Immigrant Affairs on policy initiatives, such as municipal IDs, to increase the quality of life for undocumented individuals.
13. To strengthen my advocacy efforts on behalf of both undocumented youth and youth in foster care, I recently enrolled in the evening program at CUNY Law School. I applied only to

CUNY because their mission resonates so strongly with me - - “Law In the Service of Human Needs.” My anticipated graduation date is May 2021.

14. My current DACA status expires in March 2019. If DACA is rescinded, my life will be drastically altered. I will lose my work authorization and therefore be unable to keep the job that I love providing much needed services to foster youth. Additionally, without the income from this job, I will be unable to afford my law school tuition and will likely have to withdraw. Even if I am somehow able to continue my legal education, without DACA status I will be unable to gain admission to the New York Bar and practice law.
15. Revocation of my DACA status will also result in the loss of my drivers license and an inability to renew my nursing license when it expires in April 2019.
16. Besides its impact on me, the revocation of DACA will also have serious consequences for my sister, who will no longer be able to obtain the life-saving medical care that she needs.
17. I have lived, worked and studied in the United States for the majority of my life. It is my home. I have long dreamt about giving back to the country that gave so much to my sister and I. I have taken the necessary steps to make those dreams a reality. Now that I finally have the chance to use my education to help other New Yorkers, I hope I am not forced to give it up.

Dated: September 6, 2017

/s Hina Naveed

Hina Naveed

